



August 2, 2011

**Ex Parte**

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Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

**Re: IB Docket No. 05-50**

Dear Ms. Dortch:

On August 1, 2011, Thomas Tauke, Executive Vice President, Public Affairs, Policy and Communications for Verizon, spoke by telephone to FCC Chief of Staff Edward Lazarus about the Foreign Ownership Review Guidelines Clarification Order and Declaratory Ruling that is on the agenda for the Commission's August meeting.<sup>1</sup>

Mr. Tauke explained Verizon's concerns regarding the Guidelines' interpretation of Section 310(b)(3), consistent with the petition for reconsideration filed in IB Docket 05-55.<sup>2</sup> Prior to the Guidelines, the Commission had reviewed, under the standards of section 310(b)(4) of the Act, foreign investment in a U.S. company that in turn holds an interest in a Commission licensee. The Guidelines state the International Bureau's view, however, that section 310(b)(3) governs when a foreign entity invests in a domestic company that in turn holds a non-controlling interest in a licensee. In short, the *Guidelines* appear to establish a new approach to minority indirect investment that should not be adopted by the Commission.

Pursuant to section 1.1206 of the Commission's rules, this *ex parte* notification is being filed electronically with your office. Please contact the undersigned should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Tamara Preiss", written in a cursive style.

cc: (by e-mail)  
Edward Lazarus

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<sup>1</sup> *New Release*, "FCC Announced Tentative Agenda for August 9<sup>th</sup> Open Meeting," July 19, 2011.

<sup>2</sup> Wilkinson Barker Knauer Petition for Reconsideration, DA 04-3610, IB Docket No. 05-50 (filed Dec. 17, 2004).